

Page 1

King, et al v Annucci, et al - 6/24/2022 - Joseph P. King

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

THE ESTATE OF JOSEPH P. KING, BY
AND THROUGH ITS ADMINISTRATRIX,
AMY KING, and AMY KING IN HER OWN
RIGHT,

Plaintiffs,

v

Index No.: 9:20-CV-1413

ANTHONY J. ANNUCCI, et al,

Defendants.

_____ X

DEPOSITION OF: JOSEPH PATRICK KING

DATE: June 24, 2022

TIME: 10:12 a.m. to 11:20 a.m.

VENUE: WebEx

COPY

ASSOCIATED REPORTERS INT'L, INC.

ARII@courtsteno.com

(800) 523-7887 www.courtsteno.com

Transcription - National and International reporting coverage

800.523.7887

Associated Reporters Int'l., Inc.

Page 2

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King

2 APPEARANCES:

3 FOR THE PLAINTIFF:

4 HACH ROSE SCHIRRIPA & CHEVERIE, L.L.P.

5 BY: YAMILE KALKACH, ESQ.

6 112 Madison Avenue

7 New York, New York 10016

8 FOR THE DEFENDANTS:

9 OFFICE OF THE NEW YORK STATE ATTORNEY GENERAL

10 BY: AIMEE COWAN, ESQ.

11 300 South State Street, Suite 300

12 Syracuse, New York 13205

13

14

15

16

17

18

19

20

21

22

23

24

25

800.523.7887

Associated Reporters Int'l., Inc.

Page 3

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King

2 I N D E X O F P R O C E E D I N G S

3 JOSEPH PATRICK KING: Sworn

4 Direct Examination by Ms. Cowan 5

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

800.523.7887

Associated Reporters Int'l., Inc.

Page 4

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King

2 STIPULATIONS

3 It is HEREBY STIPULATED by and among the attorneys
4 for the respective parties, in accordance with the Federal
5 Rules of Civil Procedure, that this deposition may be
6 taken by the Defendant at this time, pursuant to subpoena;

7 FURTHER STIPULATED, that all objections except as to
8 the form of the questions and responsiveness of the
9 answers, be reserved until trial;

10 FURTHER STIPULATED, that the witness may read and
11 sign the deposition and make any corrections to same
12 before any Notary Public;

13 AND FURTHER STIPULATED, that if the original
14 deposition has not been duly signed by the witness and
15 returned to the attorney taking the deposition by the time
16 of trial or any hearing in this cause, a certified copy of
17 the deposition may be used as though it were the original

18

19

20

21

22

23

24

25

800.523.7887

Associated Reporters Int'l., Inc.

Page 5

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King
2 (The deposition commenced at 10:12
3 a.m.)

4 THE COURT REPORTER: Mr. King, can you
5 please raise your right hand? Do you swear or affirm
6 that the testimony you are about to give today in
7 this cause will be the truth, the whole truth and
8 nothing but the truth?

9 MR. KING: Yes.

10 JOSEPH KING; Sworn

11 THE COURT REPORTER: Can you please
12 state your name for the record?

13 THE WITNESS: Joseph King.

14 THE COURT REPORTER: Can you please
15 spell your name for the record?

16 THE WITNESS: J-O-S-E-P-H K-I-N-G.

17 THE COURT REPORTER: Thank you. The
18 witness has been sworn.

19 MS. COWAN: Thank you.

20 DIRECT EXAMINATION

21 BY MS. COWAN:

22 Q. Good morning, Mr. King. My name
23 is Aimee Cowan. I work for the Office of the
24 Attorney General, and I have a few questions for you
25 this morning but I'm going to try to keep it as brief

800.523.7887

Associated Reporters Int'l., Inc.

Page 6

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King
2 as I can, okay?

3 A. Okay. Sounds good.

4 Q. If I ask a question that you
5 don't understand please tell me. I can rephrase it
6 for you, okay?

7 A. Okay.

8 Q. Just got to make sure that your
9 answers are audible. No shaking your head or saying
10 uh-huh. Just so that we can get a clear record okay?

11 A. Okay.

12 Q. Is there anybody else in the room
13 with you right now?

14 A. No.

15 Q. And can you state your full name
16 for the record please?

17 A. Joseph Patrick King, Jr.

18 Q. What is your date of birth?

19 A. [REDACTED]

20 Q. Are there any other names that
21 you've gone by?

22 A. No.

23 Q. Are you on any medications today
24 that could affect your ability to testify truthfully?

25 A. No.

800.523.7887

Associated Reporters Int'l., Inc.

Page 7

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King

2 Q. Have you drank any alcohol today?

3 A. No.

4 Q. Other than an attorney, have you
5 discussed this deposition with anybody else?

6 A. No.

7 Q. Did you review anything in
8 preparation for this deposition?

9 A. No.

10 Q. Are you currently married?

11 A. No.

12 Q. Have you ever been married?

13 A. No.

14 Q. Do you have any kids?

15 A. No.

16 Q. Where do you currently reside?

17 A. Clifton Park, New York.

18 Q. And who lives there with you?

19 A. My girlfriend and my sister

20 Meghan.

21 Q. And do you rent or do you own
22 that residence?

23 A. We currently rent.

24 Q. Is it a house or an apartment?

25 A. Apartment.

800.523.7887

Associated Reporters Int'l., Inc.

Page 8

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King

2 Q. How long have you lived there?

3 A. Since January 2021.

4 Q. And prior to January 2021 where
5 did you live?

6 A. Saratoga Springs, New York.

7 Q. How long did you live in Saratoga
8 Springs?

9 A. That was fifteen months.

10 Q. Okay. So about, I can do my math
11 here, 2019 to 2021?

12 A. Yes, October 2019 to January
13 2021.

14 Q. Okay. Okay. And who did you
15 live with in Saratoga Springs?

16 A. My girlfriend and my sister
17 Meghan.

18 Q. Prior to October 2019 where did
19 you live?

20 A. Port Henry, New York.

21 Q. And who did you live with there?

22 A. That was my sister Meghan and my
23 mom Amy.

24 Q. And was that in the house that
25 you grew up in?

800.523.7887

Associated Reporters Int'l., Inc.

Page 9

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King

2 A. Yes, it was.

3 Q. All right. What is the highest
4 level of education that you've achieved?

5 A. Some college.

6 Q. Where did you attend college?

7 A. I attended SUNY Adirondack in
8 Queensbury, New York.

9 Q. How many credits did you ...?

10 A. At this time I'm not sure the
11 exact number of credits I finished with.

12 Q. Okay. How long did you attend
13 that school?

14 A. I attended the full semester and
15 then I didn't go back to SUNY Adirondack after.

16 Q. When was that? When was the
17 semester ended?

18 A. That was after I graduated in
19 2017, and the semester ended in December 2017.

20 Q. Okay. Why did you not go back to
21 school after that semester?

22 A. At the time I was thinking about
23 transferring to a closer school. I was staying in
24 the dorms in Queensbury and the amount of money it
25 was costing was too much to be away only like an hour

800.523.7887

Associated Reporters Int'l., Inc.

Page 10

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King
2 and a half away from home.

3 Q. And did you ...?

4 A. I was planning on going to North
5 Country Community College for business and I was
6 signed up to go, but during that semester that's when
7 the incident with my father occurred.

8 THE COURT REPORTER: Ms. Cowan? Can
9 you repeat that -- that question? I did not hear it
10 all. Yeah, it's --.

11 MS. COWAN: Okay. I'm not
12 understanding where that feedback is coming from.

13 THE COURT REPORTER: Yeah, I'm not.

14 MS. COWAN: Because I'm getting like a
15 lot of echoing. Are you?

16 THE COURT REPORTER: Same.

17 MS. KALKACH: I think now it's good.

18 THE COURT REPORTER: Okay.

19 MS. COWAN: Is it right now?

20 THE COURT REPORTER: Now -- I believe
21 something's going on on your end, Mr. King, because I
22 -- I keep seeing like the audio come through, like
23 the echo come through on your screen.

24 THE WITNESS: Okay. Let me see if I
25 could maybe change --.

800.523.7887

Associated Reporters Int'l., Inc.

Page 11

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King

2 THE COURT REPORTER: Ms. Cowan, would

3 you like me to go off the record?

4 MS. COWAN: I didn't hear what you

5 just said.

6 MS. KALKACH: Me neither.

7 THE COURT REPORTER: Would you like me

8 to go off the record?

9 MS. COWAN: Yeah.

10 (Off the record 10:17 a.m.)

11 (On the record 10:20 a.m.)

12 BY MS. COWAN: (Cont'g.)

13 Q. Okay. We were discussing that

14 you were -- you left SUNY Adirondack and you were

15 going to transfer to North Country Community College

16 for the semester of -- was it the fall 2018?

17 A. Yes, it was.

18 Q. Okay. And then you said the

19 incident with your father happened so you never ended

20 actually transferring?

21 MS. KALKACH: Objection.

22 A. I did --.

23 BY MS. COWAN: (Cont'g.)

24 Q. You can answer. Can you hear us

25 still, Mr. King? Mr. King, can you hear us? Can

800.523.7887

Associated Reporters Int'l., Inc.

Page 12

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King
2 anyone hear me?

3 MS. KALKACH: I can hear you.

4 THE COURT REPORTER: I can hear you
5 fine.

6 MS. COWAN: Oh, I think he's on mute
7 now.

8 THE COURT REPORTER: It's not showing
9 mute on my end.

10 THE WITNESS: Okay. Can you hear me
11 now or?

12 THE COURT REPORTER: Yes.

13 MS. COWAN: Yes.

14 THE COURT REPORTER: Now we can hear
15 you.

16 MS. COWAN: There we go.

17 THE WITNESS: Okay. I don't know what
18 happened. Something popped up and it -- what was the
19 last question? I'm sorry.

20 BY MS. COWAN: (Cont'g.)

21 Q. Okay. So the last question was
22 is that you didn't actually officially transfer to
23 North Country Community College because of the
24 incident with your father, is that what you said?

25 A. I did transfer, I just did not

800.523.7887

Associated Reporters Int'l., Inc.

Page 13

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King
2 finish the semester.

3 Q. Oh, I see. Okay. And so SUNY
4 Adirondack who paid for that college experience?

5 A. Anything besides financial aid
6 would have been my mom.

7 Q. Okay. And what about North
8 Country Community College, who paid for that?

9 A. That would have been the same as
10 well.

11 Q. Other than what we just talked
12 about, any other college courses you've taken?

13 A. I took two that counted as
14 college courses in high school as A.P. histories.

15 Q. Okay. But no other formal
16 college schooling, is that right?

17 A. No.

18 Q. Did you --.

19 A. Yes, that's right.

20 Q. Okay. Did you achieve any
21 certifications or licenses or anything like that?

22 MS. KALKACH: Objection.

23 A. No.

24 BY MS. COWAN: (Cont'g.)

25 Q. I think you said you graduated

800.523.7887

Associated Reporters Int'l., Inc.

Page 14

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King
2 high school in 2017.

3 A. Correct.

4 Q. What high school did you graduate
5 from?

6 A. Moriah Central School.

7 Q. Have you ever been convicted of a
8 crime?

9 A. No.

10 Q. Are you currently employed?

11 A. Yes.

12 Q. Where are you employed?

13 A. Walmart.

14 Q. How long have you been employed
15 there?

16 A. Since the beginning of this
17 month.

18 Q. Okay. So since beginning of June
19 2022?

20 A. Correct.

21 Q. What position do you have at
22 Walmart?

23 A. I am a digital personal shopper.

24 Q. Prior to your employment at
25 Walmart this month, where were you employed?

800.523.7887

Associated Reporters Int'l., Inc.

Page 15

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King

2 A. I was a independent contractor

3 for Grubhub.

4 Q. How long did you do that?

5 A. That was for at least a year.

6 And before that I also did independent contractor for

7 Doordash as well.

8 Q. And I'm assuming you mean that
9 you delivered food in your car for both of those
10 companies?

11 A. Correct.

12 Q. Okay. Prior to working for
13 Grubhub and Doordash where were you employed?

14 A. Directly behind those two was
15 Walgreens. That was when I lived in Saratoga.

16 Q. Okay. And how long were you
17 employed at Walgreens?

18 A. That was a seasonal position so
19 it was only for the holiday season.

20 Q. The holiday season would have
21 been back in 2019?

22 A. 2021.

23 Q. Okay. Prior to -- okay. So were
24 you employed at Walgreens and Doordash or Grubhub at
25 the same time?

800.523.7887

Associated Reporters Int'l., Inc.

Page 16

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King

2 A. Correct.

3 Q. All right. Prior to Walgreens
4 where were you employed?

5 A. I also worked seasonally at
6 U.P.S. as a package handler.

7 Q. How long did you work at U.P.S.?

8 A. That was seasonal as well. More
9 of extra shifts and stuff like that. So it was only
10 for the -- the holiday rush -- rush as well last
11 year.

12 Q. Oh, and that was 2021?

13 A. Yes.

14 Q. Okay. Prior to there where did
15 you work? Where were you employed?

16 A. I know in Port Henry I worked as
17 a housekeeper at a hotel in Middlebury, Vermont
18 called the Middlebury Inn.

19 Q. How long did you work there?

20 A. That was for the summer before I
21 moved to Saratoga Springs, New York.

22 Q. Okay. So summer 2019?

23 A. Correct.

24 Q. All right. And then prior to
25 summer 2019 did you have any employment?

800.523.7887

Associated Reporters Int'l., Inc.

Page 17

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King

2 A. In high school I did work two
3 years consecutively for my school's youth summer
4 program for the town. And then the one year I also -
5 - in 2017 I worked as a bus boy for a restaurant on
6 Lake Champlain in Westport, New York called ...

7 Q. Okay. All right. Now your
8 mother has filed a lawsuit against some New York
9 State employees who I represent, and that's why I'm
10 asking you some questions today. And I was wondering
11 if you were familiar at all with the complaint that
12 she filed.

13 MS. KALKACH: Objection. You can
14 answer.

15 A. Yes.

16 BY MS. COWAN: (Cont'g.)

17 Q. Have you seen the complaint that
18 she filed?

19 A. Not visually, no.

20 Q. Okay. Are you familiar with some
21 of the allegations that she has made in her
22 complaint?

23 A. Yes.

24 Q. What is your understanding of
25 what the complaint is alleging?

800.523.7887

Associated Reporters Int'l., Inc.

Page 18

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King

2 A. The main complaint is --

3 actually, would I be able to have you rephrase that
4 just so I would be able to give a more clear answer?

5 Q. Sure. I just was wondering what
6 your understanding is of what your -- what your
7 mother is alleging in her lawsuit against the state
8 employees?

9 A. I would say she is alleging
10 negligence of responsibility that the employees had
11 to protect inmates from self-endangerment and self-
12 harm.

13 Q. Okay. Are you familiar with a
14 social worker named Jamie Paledeno [phonetic
15 spelling]?

16 A. I am not, no.

17 Q. So you never spoke to her
18 personally?

19 A. No, I have not.

20 Q. And obviously you never met her
21 in person?

22 A. No, I have not.

23 Q. Are you familiar with a New York
24 State employee named Hal Myers [phonetic spelling]?

25 A. No, I am not.

800.523.7887

Associated Reporters Int'l., Inc.

Page 19

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King

2 Q. So then I'm assuming you've never
3 spoken to him either in person or over the phone or -
4 - or some other way?

5 A. No, I have not.

6 Q. Okay. Now I'm going to get into
7 some questions about your father, and I want you to
8 let me know if you want to take a break, okay? I
9 completely understand if you want to take a break. I
10 just ask that if I have a question pending just
11 answer the question first and then we can take a
12 break, okay?

13 A. Okay.

14 Q. Now it's my understanding that
15 your father was arrested in 2012. Is that accurate?

16 A. Yes.

17 Q. And after he was arrested he
18 spent some time in a local prison, Essex County Jail,
19 is that right?

20 A. Yes. The local jail, correct.

21 Q. Okay. How old were you when he
22 was arrested in 2012?

23 A. At the time of the arrest I was
24 twelve.

25 Q. What grade were you in at that

800.523.7887

Associated Reporters Int'l., Inc.

Page 20

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King
2 time?

3 A. Seventh grade.

4 Q. And your father was then
5 incarcerated with the New York State Department of
6 Corrections from 2013 until his death in 2018, is
7 that right?

8 MS. KALKACH: Objection.

9 A. Correct.

10 BY MS. COWAN: (Cont'g.)

11 Q. Are you familiar with the
12 criminal conviction that led to his incarceration?

13 A. Yes.

14 Q. And what was that criminal
15 conviction?

16 A. Arson.

17 Q. Did you ever speak to your father
18 about that conviction?

19 A. Very seldomly [sic].

20 Q. All right. And I know you were
21 twelve at the time he was arrested so it was some
22 time ago. But had he been convicted of a crime prior
23 to 2013 or 2012?

24 MS. KALKACH: Objection.

25 A. I don't believe so, no.

800.523.7887

Associated Reporters Int'l., Inc.

Page 21

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King

2 BY MS. COWAN: (Cont'g.)

3 Q. Okay. Had he ever been arrested
4 prior to that 2012 arrest for arson?

5 MS. KALKACH: Objection.

6 A. I don't believe so.

7 BY MS. COWAN: (Cont'g.)

8 Q. So when your father began his --
9 his actual prison sentence with New York State in
10 2013 you would have been thirteen years old?

11 A. Yeah, so it was before March
12 16th, correct?

13 Q. Okay. So you were either
14 thirteen or -- or fourteen years old?

15 A. Correct.

16 Q. Prior to his incarceration in
17 2013 can you describe your relationship with your
18 dad?

19 A. Yes. We were very close. He
20 always worked overnights. He would come home from
21 overnights without even sleeping just to do things
22 with me. He was always able to help me with homework
23 or always was chaperoning for field trips or bringing
24 me and my friends to places like Great Escape or
25 swimming holes. And even a lot of my friends still

800.523.7887

Associated Reporters Int'l., Inc.

Page 22

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King
2 have vivid memories of summer memories and time --
3 times that we spent with him. Even through his
4 incarceration we still remained really close.

5 Q. Okay. I'm going to ask a few
6 questions about before his incarceration and then
7 during his incarceration. So -- so we'll stick to
8 before he went to prison. Was there anything that he
9 -- that he taught you how to do? Ride a bike, fish,
10 things like that?

11 A. Yes. He taught me how to ride a
12 bike. He taught me how to do many, I would say,
13 various tasks that I can't think of necessarily off
14 the top of my head. But simple things even around
15 the house that he would always show me as I went.
16 Like how to fix a toilet if it was, you know, not
17 filling up with water, how to go inside of the tank
18 and fix it or simple things with the setting up our
19 pool and cleaning it. Just little things that he
20 didn't need to teach me but I still remember to this
21 day and can still use because he taught me. And I
22 never had to learn myself.

23 Q. Now you said when you were
24 growing up he was working overnight. Do you know
25 where he was working at that time?

800.523.7887

Associated Reporters Int'l., Inc.

Page 23

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King

2 A. He was working at Walmart.

3 Q. What was his position at Walmart?

4 MS. KALKACH: Objection.

5 A. He was an overnight stocker.

6 BY MS. COWAN: (Cont'g.)

7 Q. And do you know how long he
8 worked at Walmart as a overnight stocker?

9 A. I do not.

10 Q. Do you know how old you were when
11 he was working that position?

12 A. I believe around eleven.

13 Q. Okay. Prior to his incarceration
14 did your dad help out around the house?

15 A. Oh, yes. He helped out mostly,
16 you know, through yard work and simple, you know,
17 fixing tasks. And would even always help other
18 neighbors shovel when they would see if we had
19 elderly neighbors. And he would always help them
20 shovel. If anyone ever needed help painting he would
21 always go over and help paint. And, yeah, he was --
22 he was very, very outgoing when it came to providing
23 a -- a helping hand.

24 Q. Other than that position at
25 Walmart that you already described, do you know any

800.523.7887

Associated Reporters Int'l., Inc.

Page 24

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King
2 other employment he had while you were growing up?

3 A. Yes. He also worked overnights
4 for Mountain Lake Service Company.

5 Q. And what was his position there?

6 A. That I'm not a hundred percent
7 sure, but it was a sort of caretaker for the clients
8 of the service.

9 Q. And it was called the Mountain
10 Lake Service Company?

11 A. Mountain Lake Services, yes. It
12 was service with people with mental disabilities.

13 Q. Okay. Do you recall how old you
14 were when he was working at that company?

15 A. That was through my childhood.

16 Q. Before your dad was incarcerated,
17 was your mom also employed?

18 A. Yes, she was.

19 Q. Do you recall where she was
20 employed?

21 A. She has worked, I think, a few
22 different teaching positions, but they've always been
23 very similar. And, yeah, I -- I can't remember
24 exactly what the company was called. But she was
25 always a teacher's assistant.

800.523.7887

Associated Reporters Int'l., Inc.

Page 25

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King

2 Q. Okay. And was that full time or
3 part time work?

4 A. Full time.

5 Q. To your knowledge did your father
6 have any substance abuse issues before he was
7 incarcerated?

8 A. He did not.

9 Q. Were you familiar with any mental
10 health conditions that he may have been diagnosed
11 with prior to his incarceration?

12 A. Depression.

13 Q. How were you aware that he had
14 been diagnosed with depression?

15 A. Just through like simple
16 conversation with him.

17 Q. Okay. And that was before he
18 went into jail in 2013?

19 A. Yes.

20 Q. Did his depression ever affect
21 your relationship with him?

22 A. No. After him clarifying I -- I
23 believe I might have asked why he was at the doctors
24 or why he had medication and I -- because I never
25 really noticed anything that was wrong that has my

800.523.7887

Associated Reporters Int'l., Inc.

Page 26

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King
2 curiosity to wonder why he, you know, was going to
3 the doctors or somewhat, you know.

4 Q. Okay. And do you know what
5 medications he was on?

6 A. I do not.

7 Q. At what age did you have
8 conversations with him about his depression
9 diagnosis?

10 A. I cannot recall an exact age, but
11 as -- it was as I got older and began to have
12 questions about depression and mental health.

13 Q. Okay. And again this was before
14 he went away to prison in 2013?

15 A. Correct.

16 Q. All right. Were you ever
17 diagnosed with any mental health conditions before he
18 was incarcerated?

19 MS. KALKACH: Objection.

20 A. No.

21 BY MS. COWAN: (Cont'g.)

22 Q. Did you ever receive any
23 prescriptions for any mental health conditions before
24 your father was in prison?

25 MS. KALKACH: Objection

800.523.7887

Associated Reporters Int'l., Inc.

Page 27

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King

2 A. No.

3 BY MS. COWAN: (Cont'g.)

4 Q. Now I want to kind of switch
5 gears to during his incarceration. So from about
6 2012-ish to 2018.

7 A. Okay.

8 Q. Were you -- were you diagnosed
9 with any mental health conditions during that time
10 period?

11 A. Yes, anxiety and depression.

12 Q. Do you recall when those
13 diagnoses were made?

14 A. I do not.

15 Q. I did receive some medical
16 records based on some authorizations that your
17 attorneys have sent me, one of which which was from
18 Ticonderoga Health Center. Is that where you treated
19 for the depression anxiety that you just mentioned?

20 A. Correct.

21 Q. Okay. And did -- did you ever
22 indicate to your doctors or did they ever indicate to
23 you what the cause of your anxiety or depression was?

24 A. Yes, but it was never a specific
25 pinpoint. There was obviously some things that

800.523.7887

Associated Reporters Int'l., Inc.

Page 28

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King
2 contributed way more than every other little factor.
3 But there -- there definitely was a lot going on at
4 the time that contributed to it. But the doctors did
5 never specifically say you have depression because of
6 this event or because of ...

7 Q. Okay. Did -- did your father's
8 incarceration did that contribute to your anxiety?

9 A. Yes.

10 Q. Same thing with depression. Did
11 your father's incarceration contribute to your
12 depression?

13 A. Yes.

14 Q. How often did you treat at
15 Ticonderoga Health Center for those conditions?

16 A. Do you mean how many times did I
17 like go? Like how many appointments or?

18 Q. Yeah.

19 A. I -- I do not recall, but it was
20 regular checkups as they had me come back.

21 Q. Okay. Any ballpark figure like
22 once a month or once every six months or anything
23 like that?

24 A. It definitely would have been
25 within a three month radius.

800.523.7887

Associated Reporters Int'l., Inc.

Page 29

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King

2 Q. Okay. And was that during the
3 entire time that your father was in prison from 2013
4 until 2018?

5 A. I'm not a hundred percent sure
6 but I believe so, yes.

7 Q. Okay. Now you said that there
8 was a lot of things that were contributing to your
9 anxiety and depression. Other than your father being
10 in prison, what else was contributing to those mental
11 health conditions?

12 A. I would say just school work and
13 bullying.

14 Q. Okay. You -- you experienced
15 some bullying at school during that time?

16 A. Yes, I did.

17 Q. And was it because of your father
18 being in prison or for some other reason?

19 A. Both.

20 Q. While you were in school and your
21 father was in prison, were you ever disciplined at
22 school?

23 A. No.

24 Q. Were you prescribed any mental
25 health medications during that time period?

800.523.7887

Associated Reporters Int'l., Inc.

Page 30

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King

2 A. Yes.

3 Q. What were you prescribed?

4 A. I believe at the time it was
5 called sertraline. I'm not a hundred percent sure
6 just because it was back when I was in going to the
7 Ti Health Center. But I believe at the time it was
8 sertraline.

9 Q. Do you remember when you were
10 prescribed that medication?

11 A. I cannot give an exact date, no.

12 Q. Okay. But it -- it was before
13 your father's death in 2018?

14 A. Correct.

15 Q. And that medication, was that
16 used to treat your anxiety or depression or both?

17 A. I believe mainly depression.

18 Q. Were you also prescribed
19 hydroxyzine?

20 A. I have been. I'm not a hundred
21 percent sure when that was prescribed, but that was a
22 prescription to help with anxiety.

23 Q. Okay. And was that a
24 prescription to be taken on as an needed basis or --
25 or something else?

800.523.7887

Associated Reporters Int'l., Inc.

Page 31

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King

2 A. As needed.

3 Q. Okay. And do you recall when you
4 were prescribed that medication?

5 A. I do not.

6 Q. But it was before your father's
7 death in 2018?

8 A. Correct.

9 Q. You recall how often you took
10 that medication?

11 A. I did not take it very much ever
12 before his death.

13 Q. Okay. And the sertraline, do you
14 recall how often you took that medication?

15 A. That was a once a day I believe.

16 Q. Other than the Ticonderoga Health
17 Center, did you treat anywhere else for any mental
18 health conditions during that time period?

19 A. No, I did not.

20 Q. Were you prescribed any other
21 medications during that time period?

22 A. I do not believe so.

23 Q. Going to ask you a really broad
24 question and I apologize. And let me know if you can
25 answer this or not. But how did your father's jail

800.523.7887

Associated Reporters Int'l., Inc.

Page 32

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King
2 sentence affect your life?

3 MS. KALKACH: Objection.

4 A. Still answer? Right?

5 MS. KALKACH: Yes.

6 A. Oh, okay. So I would say his
7 jail sentence affected my life in a very large way
8 from school to college to work. It gave me a way
9 more detailed and clear perspective on a lot of
10 different things. And it put me through a lot of
11 depression and anxiety. But it wasn't something I
12 couldn't overcome which is something I never would
13 believe that I could overcome. So it's taught me a
14 lot about perseverance and, you know, self-strength.

15 And also just to be more grateful with
16 family members. It was something I could never seen
17 happen so once happening it felt kind of like a
18 dream. And, yeah, I would say it -- it definitely,
19 you know, hurt over time. But it did have somewhat
20 of a character building aspect to my personality.

21 Q. Did your relationship with your
22 father change after he was in prison?

23 A. No.

24 Q. So you -- you perceived your
25 relationship to be just as close as it was when he

800.523.7887

Associated Reporters Int'l., Inc.

Page 33

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King
2 was not in prison?

3 A. Besides physical, yes.

4 Q. Was he able to send your mom or
5 your family any money while he was in prison?

6 A. No.

7 Q. While -- and I know you were very
8 young when he went away to jail, but -- but while he
9 was in jail, did you contribute any money towards
10 bills or -- or your family while he was in prison?

11 A. Not to bills, no.

12 Q. Did you contribute any money
13 towards anything in your household while your dad was
14 in prison?

15 A. Very seldom. Only if it was
16 something extra for myself.

17 Q. While your father was in prison,
18 did you visit him?

19 A. Often, yes.

20 Q. How often would you say you
21 visited him?

22 A. I would say my mom went almost
23 every single weekend. So she would -- I would tag
24 along with her at least one weekend per month.

25 Q. What about in the -- the last

800.523.7887

Associated Reporters Int'l., Inc.

Page 34

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King
2 year that he was in prison. How often did you see
3 him?

4 A. That would -- I would say around
5 a similar time. Around at least once a month.

6 Q. How long were those visits
7 typically?

8 A. We would stay the -- the whole
9 duration most of the time. As soon as we could get
10 there and get over there and he, you know, was
11 brought over. We sat down and didn't leave until
12 they -- they called for us to leave.

13 Q. Was that a couple hours or was
14 that all day or how long would that typically be?

15 A. I cannot remember the time they
16 would exactly call but it did feel like all day at
17 the time.

18 Q. What about letters. Did you ever
19 write him any letters while he was in prison?

20 A. Yes, I have a -- a lockbox full
21 of letters.

22 Q. Letters that you wrote or letters
23 that he wrote to you?

24 A. Letters he wrote to me.

25 Q. And did you speak with him on the

800.523.7887

Associated Reporters Int'l., Inc.

Page 35

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King
2 phone while he was in prison?

3 A. Yes, often.

4 Q. How often would you say you spoke
5 to him?

6 A. At least five times a week. Five
7 days out of the week I would say multiple times a day
8 if he could call.

9 Q. During the conversations you had
10 with him on the phone, did he ever express to you
11 that he wanted to harm himself in any way?

12 A. Never.

13 Q. Did he ever speak to you about
14 any medications that he had been prescribed while in
15 jail?

16 A. Never.

17 Q. Did he ever speak to you about
18 wanting to change medications or obtain different
19 medications, anything like that while you were
20 speaking to him?

21 A. Not to me, no.

22 Q. Did he speak to anybody else in
23 your family about his medications?

24 A. It would only be my mother.

25 Q. Were you ever concerned that he

800.523.7887

Associated Reporters Int'l., Inc.

Page 36

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King
2 would try to take his own life while he was in
3 prison?

4 A. Not before the first attempt.
5 But after, yes.

6 Q. Okay. So that -- that leads me
7 up to my question that you are aware that he
8 attempted suicide in -- in July of 2016?

9 A. I am.

10 Q. How did you become aware of that
11 attempt?

12 A. That I actually asked him myself.

13 Q. And what did he say to you?

14 A. I -- I already knew of the ...
15 and I asked him if it was true or not. And he did
16 say it was true. But it was more of a -- a calm,
17 educational talk rather than a dramatic, you know,
18 movie scene.

19 Q. Okay. Did he indicate why he
20 attempted suicide?

21 MS. KALKACH: Objection.

22 A. No.

23 BY MS. COWAN: (Cont'g.)

24 Q. How did you initially find out
25 that he attempted in 2016?

800.523.7887

Associated Reporters Int'l., Inc.

Page 37

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King

2 A. Just through conversations I

3 picked up on through my -- my mom and sister.

4 Q. Did he ever indicate to you that

5 he regretted attempting suicide at that time?

6 A. Yes.

7 Q. You recall exactly what he said

8 to you about that?

9 MS. KALKACH: Objection.

10 A. I cannot recall an exact thing.

11 BY MS. COWAN: (Cont'g.)

12 Q. Okay. Did he ever indicate to

13 you that he would never try that again in the future?

14 MS. KALKACH: Objection.

15 A. He never specifically indicated

16 that, no.

17 BY MS. COWAN: (Cont'g.)

18 Q. During the time that your father

19 was in prison, did you ever personally speak with

20 anyone at the jail whether it was DOCCS staff or

21 O.M.H. staff? Did you ever personally speak to

22 anyone?

23 MS. KALKACH: Objection.

24 BY MS. COWAN: (Cont'g.)

25 Q. No. Did you ever partially speak

800.523.7887

Associated Reporters Int'l., Inc.

Page 38

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King
2 to any staff over the phone about your father?

3 A. No.

4 Q. Did you ever send any
5 correspondence, any letters or anything like that to
6 any prison staff whether it's DOCCS or O.M.H.?

7 A. No.

8 Q. So I think you said after you
9 became aware of his suicide attempt in 2016 you were
10 concerned that he may try again to take his own life?

11 MS. KALKACH: Objection.

12 A. Yes.

13 BY MS. COWAN: (Cont'g.)

14 Q. Did -- did you communicate your
15 concerns with anybody?

16 A. I would say my -- my mom and
17 sister.

18 Q. What about any -- any doctors
19 that you were seeing at the time. Did you express
20 any concerns to any doctors or therapists or any
21 other medical professionals?

22 A. Never a specific concern
23 regarding him and his -- his personal matters. But I
24 would give a -- a -- a gist of what I was going
25 through. So I would talk to them about it, but just

800.523.7887

Associated Reporters Int'l., Inc.

Page 39

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King
2 not in specifics.

3 Q. Okay. And I know you were young
4 -- you must have been about seventeen after your --
5 your father's first attempt in 2016, is that right?

6 A. Yes.

7 Q. And -- and I'm -- am I right that
8 you didn't -- you didn't convey your concerns about
9 your father to anybody with DOCCS or O.M.H. or any
10 other jail staff?

11 MS. KALKACH: Objection.

12 A. No.

13 BY MS. COWAN: (Cont'g.)

14 Q. I'd like to take you up to -- to
15 the week leading up to his death, and that would have
16 been the week prior to November 16th, 2018. Do you
17 recall speaking with him at all on the phone during
18 that period of time?

19 A. Yes.

20 Q. What was the sum and substance of
21 those conversations?

22 A. From what I can recall it was
23 similar conversations as usual. Again, I -- I don't
24 feel like he would ever try to show me a depressive
25 side no matter what he was feeling. Even if he -- he

800.523.7887

Associated Reporters Int'l., Inc.

Page 40

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King
2 told me he was not feeling great that day he would
3 always try to make the conversations focus about me
4 and how my day was or what I wanted to talk about.

5 Q. Did he ever express to you any
6 concerns that your mom was going to leave him?

7 A. Slightly.

8 Q. Can you tell me about those
9 conversations?

10 A. It was just very, very seldom I
11 would hear about it. It was just more of him not
12 having I feel like control being somewhere, you know,
13 with skepticism. Most people would sit there and go
14 on Facebook, Instagram, Twitter and stalk their, you
15 know, significant other every single way they could.
16 But I -- I know sitting in a -- in a room could, you
17 know, make your mind go crazy and I do -- I do not
18 recall exact conversations. But I just know most of
19 it was him just being just more curious than
20 anything.

21 Q. Did he ever indicate that he was
22 worried that she was seeing another man at that time?

23 MS. KALKACH: Objection.

24 A. I'm not a hundred percent sure.

25 BY MS. COWAN: (Cont'g.)

800.523.7887

Associated Reporters Int'l., Inc.

Page 41

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King

2 Q. You -- you don't recall? Is that
3 your response is that you don't recall if he was
4 saying that to you or you're not sure if he said that
5 to you or not?

6 A. Yeah, at that time -- at that
7 time I'm not sure if that's what he said to me, no.

8 Q. Okay. At any time during your
9 conversations with him, did he indicate he thought
10 that your mother was seeing another man?

11 MS. KALKACH: Objection.

12 A. I do not believe so, no.

13 BY MS. COWAN: (Cont'g.)

14 Q. Did you ever speak to your mother
15 about or did she ever speak to you about possibly
16 leaving your father?

17 A. No.

18 Q. Did she ever speak to you about
19 any plans to meet with any divorce attorneys or -- or
20 any trial separation between her and your father?

21 A. Never.

22 Q. During that last week when you
23 spoke to him on the phone, did he ever communicate to
24 you that he was thinking of -- of hurting himself in
25 any way?

800.523.7887

Associated Reporters Int'l., Inc.

Page 42

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King

2 A. No.

3 Q. Were you concerned at all that he
4 was thinking of hurting himself in any way during
5 that last week?

6 MS. KALKACH: Objection.

7 A. Not specifically, no.

8 BY MS. COWAN: (Cont'g.)

9 Q. Did he seem different at all in -
10 - in any way during that last week that you were
11 speaking to him on the phone?

12 A. Honestly, I -- I -- I can't
13 recall.

14 Q. All right. I -- I know it was
15 like four years ago at this point so it's okay if you
16 don't remember. When was the last time that you
17 visited your father in prison?

18 A. I cannot remember the exact date.
19 Probably a few weekends before his incident.

20 Q. You recall his demeanor during
21 that particular visit?

22 A. Again, to me it was -- it was
23 always very, very similar. He would -- he would just
24 try to put on the best ... and not sulk in front of
25 me.

800.523.7887

Associated Reporters Int'l., Inc.

Page 43

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King

2 Q. So during that last visit he
3 didn't give any indication that he was thinking of --
4 of hurting himself in any way?

5 A. Not to me, no.

6 Q. After you left that last visit
7 with him, were you concerned that he was going to
8 hurt himself?

9 MS. KALKACH: Objection.

10 A. Never from something he said or
11 did.

12 BY MS. COWAN: (Cont'g.)

13 Q. But were you concerned for any
14 other reason?

15 A. Being in a depressive state in
16 that environment, yes.

17 Q. Did he appear to be depressed to
18 you when you met with him that last time?

19 A. Again, he never appeared it to me
20 specifically, but I knew he was.

21 Q. How did you know?

22 A. I just -- through simple
23 conversations. And he was -- he has been through
24 depression before and waking up after he was first
25 gone to jail he -- he said, you know, he couldn't

800.523.7887

Associated Reporters Int'l., Inc.

Page 44

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King
2 believe. Like it felt like waking up from a dream
3 and he couldn't even believe that's -- that's his
4 reality. And it -- it lasted all the way until his
5 death. So I -- I knew he was definitely depressed
6 from that fact alone feeling like you are in the, you
7 know, it is your fault, it's your consequences. But
8 at the same time with no recollection and no set date
9 of getting out I can see how depression could very
10 well set in.

11 Q. Were you familiar with any parole
12 board hearings that he was in front of during his
13 time in prison?

14 A. I -- I know he went up for them
15 but I don't know specifics.

16 Q. Okay. Do you recall when he went
17 before them?

18 A. I do not.

19 Q. Do you know the result of the
20 parole board hearings?

21 A. I know they would decline I -- I
22 believe.

23 Q. Do you know why they declined to
24 award him parole?

25 A. To be honest, I'm not sure.

800.523.7887

Associated Reporters Int'l., Inc.

Page 45

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King

2 Q. Did your father discuss at any
3 time with you that he had been charged with any --
4 strike that -- charged with violating any DOCCS
5 regulations while he was in prison?

6 A. No.

7 Q. Now your father actually did
8 commit suicide on November 16th, 2018. How old were
9 you at the time?

10 A. I was nineteen.

11 Q. Where were you living at that
12 time?

13 A. That was in Port Henry, New York.

14 Q. Okay. So you were living with
15 your mom and your sister Meghan at that time?

16 A. Correct.

17 Q. After your father's death, did
18 you continue to still treat for your anxiety and
19 depression?

20 A. Yes.

21 Q. Did the treatment for your
22 anxiety and depression change at all after your
23 father's death?

24 A. Not based on that experience.
25 Just based on when I switched doctors.

800.523.7887

Associated Reporters Int'l., Inc.

Page 46

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King

2 Q. Okay. When did you switch

3 doctors?

4 A. When I moved to Saratoga.

5 Q. Who did you begin to see when you

6 moved to Saratoga?

7 A. A physician named Kathleen Condo

8 [phonetic spelling] at Community Care Physicians.

9 Q. Did any medications change

10 following your father's death?

11 A. Also can I add I meant to say

12 Ellis Medicine for my -- my last one. My recent

13 doctor is Community Care. And my last one was Ellis

14 Medicine for Kathleen Condo.

15 Q. Okay. Say that one more time.

16 L. -- L. S. Medicine?

17 A. E-L-L-I-S.

18 Q. Oh, Ellis Medicine.

19 A. Yes.

20 Q. Okay. When did you seek

21 treatment at Ellis Medicine?

22 A. That was when I -- after I moved

23 to Saratoga. I don't remember an exact date, but.

24 Q. Okay. How long did you treat

25 there for?

800.523.7887

Associated Reporters Int'l., Inc.

Page 47

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King

2 A. I believe until I switched when I
3 moved to Clifton Park.

4 Q. And Clifton Park was I think you
5 said Community.

6 A. Community Care Physicians.

7 Q. Care Physicians. Okay. At Ellis
8 Medicine, what did you treat there for?

9 A. That was depression and anxiety.

10 Q. How often did you treat at Ellis
11 Medicine?

12 A. I would say not -- not as often
13 as Ticonderoga.

14 Q. Were you prescribed any different
15 medications at Ellis?

16 A. I don't believe so. I believe I
17 switched antidepressants when I went to Community
18 Care Physicians.

19 Q. Were there any new diagnoses at
20 Ellis Medicine?

21 A. No.

22 Q. And then what about Community
23 Care? You -- I think you just said that you switched
24 antidepressants when you went to Community Care.

25 A. Yes. I started taking

800.523.7887

Associated Reporters Int'l., Inc.

Page 48

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King
2 citalopram.

3 Q. What is the dosage -- dosage for
4 that medicine?

5 A. Forty milligram.

6 Q. How often do you take that?

7 A. That is a once a day.

8 Q. What is that -- what condition
9 does that medication treat?

10 A. Depression.

11 Q. Do you recall when that
12 medication change was made?

13 A. I can't recall it exactly but it
14 was from my doctor at Community Care Physicians.

15 Q. Do you know why the medication
16 was changed?

17 A. It was, I believe, one that I
18 wanted or he wanted to switch to try to have better
19 effective -- effectiveness.

20 Q. Were you not satisfied with the -
21 - the effectiveness of the medication you had been
22 taking?

23 A. Not that I wasn't satisfied. I
24 just felt like I was being steered in a more -- more
25 comfortable direction with this medication. And this

800.523.7887

Associated Reporters Int'l., Inc.

Page 49

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King
2 did seem to be less -- less milligrams. I believe
3 sertraline used to be like double the milligrams as
4 citalopram.

5 Q. Now at Community Care were you
6 diagnosed with any other mental health conditions?

7 A. I -- I'm not sure -- well, I -- I
8 would say P.T.S.D. I'm not sure how exactly, you
9 know, he diagnosed it but we did talk about that
10 during my doctors' visits.

11 Q. Do you know if he made that
12 official diagnosis or he just discussed a possible
13 diagnosis of P.T.S.D.?

14 A. After -- well, he wanted to ask -
15 - he asked me if I would be interested in a medical
16 marijuana card for P.T.S.D. so I'm assuming it was
17 the diagnosis since the offer was -- was given
18 because after I -- it was after I told him of the
19 events with my father that the discussion of P.T.S.D.
20 began which led into that.

21 Q. Okay. Do you know if the
22 diagnosis or possible diagnosis of P.T.S.D. is linked
23 specifically to your father's death or to multiple
24 events?

25 A. Specifically to my father's

800.523.7887

Associated Reporters Int'l., Inc.

Page 50

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King
2 death.

3 Q. Are you receiving any specialized
4 treatment for P.T.S.D.?

5 A. I am not.

6 Q. Do you know when your father was
7 supposed to be released from prison, if there was any
8 date certain?

9 A. No, it was always kind of a
10 uneasy waiting game.

11 Q. Had your father been released
12 from prison, did you have any conversations with him
13 about any plans following his release? Like if you
14 would live with him or if you would start a business
15 together or anything like that? Anything about the
16 future?

17 A. A lot of things were just
18 rejoicing a lot of things we wanted to do together, a
19 lot of concerts we wanted to see. He -- he wanted to
20 come back and throw footballs or baseball. He wanted
21 to bring me to different swim holes. He has -- has
22 brought to me -- brought me to before. There was new
23 restaurants I found I wanted to show him. During his
24 incarceration I taught myself how to play guitar,
25 bass, drums and piano. And I really wanted to show

800.523.7887

Associated Reporters Int'l., Inc.

Page 51

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King
2 him all of that. I planned on him going to my -- my
3 college. But when I was moving in, transferring,
4 moving out, graduating. Talked about looking for
5 cars together and him teaching me how to them in
6 tuned. A lot of plans.

7 MS. COWAN: Okay. We can go off the
8 record quickly.

9 (Off the record 11:10 a.m.)

10 (On the record 11:18 a.m.)

11 BY MS. COWAN: (Cont'g.)

12 Q. Mr. King, prior to your father's
13 death in 2018 did you experience panic attacks?

14 A. If I did I did not understand
15 really as much they were panic attacks. I would just
16 probably assume they were anxiety.

17 Q. Did you come to find out that you
18 had experienced panic attacks during that time?

19 A. Very seldomly [sic] but yes.

20 Q. How often do you think you
21 experienced them prior to -- to your father's death?

22 A. Prior to his death it was -- it
23 was very rarely. Probably I would say almost a
24 couple times ...

25 Q. Have you experienced panic

800.523.7887

Associated Reporters Int'l., Inc.

Page 52

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King
2 attacks since his death?

3 A. Main -- mainly after, yes.

4 Q. How often?

5 A. It was mainly, I would -- I would
6 say, a few -- at one point it might have been even
7 like twice a week. Not now but closer to the events.

8 Q. How long would you say you
9 experienced panic attacks almost twice a week?

10 A. It -- it -- I would say it -- it
11 changed depending on what I was doing and how
12 distracted I was and how busy I was at the time.

13 Q. Do you know what -- what would
14 bring on these panic attacks?

15 A. Just a lot of anxious and anxiety
16 and depression from events that have happened.

17 Q. And when you say events that have
18 happened, what do you mean by that?

19 A. One being my -- my father's
20 death.

21 Q. Anything else?

22 A. That -- that would be the main
23 cause of them, yes.

24 Q. Were there any other causes that
25 were not the main cause?

800.523.7887

Associated Reporters Int'l., Inc.

Page 53

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King

2 A. Besides just general anxiety

3 about I'd say like school or work then no.

4 Q. Did you ever receive any

5 medication specifically for panic attacks?

6 A. That was what I believe the

7 hydroxyzine was for. It was mainly if I had a panic

8 attack at night that's usually when I would have

9 them. It would also help me fall asleep, but also I

10 -- I noticed when I took them it would make me drowsy

11 kind of the next morning too, so I was careful when I

12 took them as well.

13 Q. At any point when you spoke with

14 your father, did he ever mention to you that he was

15 taking medications that were not prescribed to him?

16 A. No.

17 Q. At any point did your father ask

18 you to bring him any items for him to trade while he

19 was in jail?

20 A. No, never.

21 Q. At any point did he ask you to

22 bring any items that you thought he may want to trade

23 but he denied wanting to trade?

24 A. No. I -- he's never asked for

25 anything to trade and I've never thought about

800.523.7887

Associated Reporters Int'l., Inc.

Page 54

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King
2 bringing him anything.

3 Q. At any point did he ask you to
4 bring candy for him?

5 A. No.

6 Q. Do you recall the last time you
7 spoke to your father prior to his death?

8 A. I could not -- it was over the
9 phone but I cannot recall exactly when.

10 Q. Okay. Was it a day before or two
11 days before, do you have any time prior before?

12 A. I'm -- I'm not a hundred percent
13 sure. A few -- within a -- a few days before at
14 least. Within probably two or three days.

15 Q. Do you recall the sum and
16 substance of that last conversation?

17 A. I -- I can't, no.

18 Q. At any point leading up to his
19 death did he ever discuss with you his medications
20 being discontinued?

21 A. Not to me, no.

22 Q. Did he discuss his medications
23 being discontinued to anybody else to your knowledge?

24 A. If so it would have been just my
25 mother.

800.523.7887

Associated Reporters Int'l., Inc.

Page 55

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King

2 Q. Were you aware of any such
3 conversations?

4 A. I knew they would have
5 conversations but not of what the content was about.

6 Q. Do you have any future plans to
7 go back to college or to further your education?

8 A. Recently I've been thinking about
9 possibly going back for a two-year degree. But I'm
10 still thinking since I just got this full time job.

11 Q. Did you inherit anything from
12 your father's estate?

13 A. No.

14 MS. COWAN: That's all the questions
15 that I have for you. I really appreciate it. Thank
16 you so much for sitting down and asking -- and
17 answering these questions with me. You are free to
18 go unless you're --.

19 (The deposition concluded at 11:20
20 a.m.)

21

22

23

24

25

800.523.7887

Associated Reporters Int'l., Inc.

Page 56

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King

2 STATE OF)
3 COUNTY OF)

4 I, JOSEPH PATRICK KING, have read the foregoing
5 record of my testimony taken at the time and place noted
6 in the heading hereof and do hereby acknowledge:
7 (Please check one)

8 () That it is a true and correct transcript of
9 same.

10 () With the exceptions noted in the attached
11 errata sheet, it is a true and correct transcript of same.

12

X

JOSEPH PATRICK KING

13

14 Sworn to before me this
15 _____ day of _____, 2022.

16 X _____
17 NOTARY PUBLIC
18 My Commission Expires:
19 _____

20

21

22

23

24

25

800.523.7887

Associated Reporters Int'l., Inc.

Page 57

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King

2 I, ANTHONY MCCLAIN, do hereby certify that the

3 foregoing testimony of JOSEPH PATRICK KING was taken by

4 me, in the cause, at the time and place, and in the

5 presence of counsel, as stated in the caption hereto, at

6 Page 1 hereof; that before giving testimony said witness

7 was duly sworn to testify the truth, the whole truth and

8 nothing but the truth; that the foregoing typewritten

9 transcription, consisting of pages number 1 to 55,

10 inclusive, is a true record prepared by me and completed

11 by Associated Reporters Int'l., Inc. from materials

12 provided by me.

13 *Anthony McClain*
14 ANTHONY MCCLAIN, Reporter *BAF*

15

16

17

18

19

20

21

22

23

24

25

800.523.7887

Associated Reporters Int'l., Inc.

Page 58

1 King, et al v Annucci, et al - 6/24/2022 - Joseph P. King

2 ASSOCIATED REPORTERS INTERNATIONAL, INC.
3 (800) 523-7887

4 Date:
5 Case Name: King v Annucci, et al
6 Index Number: 9:20-CV-1413
7 Deponent: Joseph Patrick King
8 Deposition Date: 6/24/2022
9 Examining Attorney: Amy Cowan, A.A.G.

10 Dear Mr. King:

11 Please read and make any changes and/or corrections in
12 your testimony and sign the transcript in the presence of
13 a notary public. Please do so within thirty (30) days.
14 If you fail to sign the transcript within thirty (30)
15 days, it will be delivered to the appropriate parties
16 without signature. Return the transcript with
17 corrections, if any, to:

18 OFFICE OF THE NEW YORK STATE ATTORNEY GENERAL
19 BY: AIMEE COWAN, ESQ.
20 300 South State Street, Suite 300
21 Syracuse, New York 13205

22 CORRECTIONS:

23 _____ Word or phrase: _____
24 _____ Corrected to: _____
25 _____ Word or phrase: _____
26 _____ Corrected to: _____
27 _____ Word or phrase: _____
28 _____ Corrected to: _____
29 _____ Word or phrase: _____
30 _____ Corrected to: _____
31 _____ Word or phrase: _____
32 _____ Corrected to: _____
33 _____ Word or phrase: _____
34 _____ Corrected to: _____

A

A.A.G 58:6
a.m 1:16,16 5:3 11:10,11 51:9
 51:10 55:20
A.P 13:14
ability 6:24
able 18:3,4 21:22 33:4
abuse 25:6
accurate 19:15
achieve 13:20
achieved 9:4
acknowledge 56:4
actual 21:9
add 46:11
Adirondack 9:7,15 11:14 13:4
ADMINISTRATRIX 1:6
affect 6:24 25:20 32:2
affirm 5:5
age 26:7,10
ago 20:22 42:15
aid 13:5
Aimee 2:10 5:23 58:13
al 1:1,1,11 2:1,1 3:1,1 4:1,1
 5:1,1 6:1,1 7:1,1 8:1,1 9:1,1
 10:1,1 11:1,1 12:1,1 13:1,1
 14:1,1 15:1,1 16:1,1 17:1,1
 18:1,1 19:1,1 20:1,1 21:1,1
 22:1,1 23:1,1 24:1,1 25:1,1
 26:1,1 27:1,1 28:1,1 29:1,1
 30:1,1 31:1,1 32:1,1 33:1,1
 34:1,1 35:1,1 36:1,1 37:1,1
 38:1,1 39:1,1 40:1,1 41:1,1
 42:1,1 43:1,1 44:1,1 45:1,1
 46:1,1 47:1,1 48:1,1 49:1,1
 50:1,1 51:1,1 52:1,1 53:1,1
 54:1,1 55:1,1 56:1,1 57:1,1
 58:1,1,4
alcohol 7:2
allegations 17:21
alleging 17:25 18:7,9
amount 9:24
Amy 1:7,7 8:23 58:6
and/or 58:8
Annucci 1:1,11 2:1 3:1 4:1 5:1
 6:1 7:1 8:1 9:1 10:1 11:1
 12:1 13:1 14:1 15:1 16:1 17:1
 18:1 19:1 20:1 21:1 22:1 23:1
 24:1 25:1 26:1 27:1 28:1 29:1
 30:1 31:1 32:1 33:1 34:1 35:1
 36:1 37:1 38:1 39:1 40:1 41:1
 42:1 43:1 44:1 45:1 46:1 47:1
 48:1 49:1 50:1 51:1 52:1 53:1
 54:1 55:1 56:1 57:1 58:1,4
answer 11:24 17:14 18:4 19:11
 31:25 32:4
answering 55:17
answers 4:9 6:9
ANTHONY 1:11 57:2,14
antidepressants 47:17,24
anxiety 27:11,19,23 28:8 29:9
 30:16,22 32:11 45:18,22 47:9
 51:16 52:15 53:2
anxious 52:15
anybody 6:12 7:5 35:22 38:15
 39:9 54:23
apartment 7:24,25
apologize 31:24
appear 43:17
APPEARANCES 2:2
appeared 43:19
appointments 28:17
appreciate 55:15
appropriate 58:10
arrest 19:23 21:4
arrested 19:15,17,22 20:21 21:3
arson 20:16 21:4
asked 25:23 36:12,15 49:15
 53:24
asking 17:10 55:16
asleep 53:9
aspect 32:20
assistant 24:25
Associated 57:11 58:2
assume 51:16
assuming 15:8 19:2 49:16
attached 56:6
attack 53:8
attacks 51:13,15,18 52:2,9,14
 53:5
attempt 36:4,11 38:9 39:5
attempted 36:8,20,25
attempting 37:5
attend 9:6,12
attended 9:7,14
attorney 2:9 4:15 5:24 7:4 58:6
 58:12
attorneys 4:3 27:17 41:19
audible 6:9

audio 10:22
 authorizations 27:16
 Avenue 2:6
 award 44:24
 aware 25:13 36:7,10 38:9 55:2

B

back 9:15,20 15:21 28:20 30:6
 50:20 55:7,9
 ballpark 28:21
 baseball 50:20
 based 27:16 45:24,25
 basis 30:24
 bass 50:25
 began 21:8 26:11 49:20
 beginning 14:16,18
 believe 10:20 20:25 21:6 23:12
 25:23 29:6 30:4,7,17 31:15,22
 32:13 41:12 44:2,3,22 47:2,16
 47:16 48:17 49:2 53:6
 best 42:24
 better 48:18
 bike 22:9,12
 bills 33:10,11
 birth 6:18
 board 44:12,20
 boy 17:5
 break 19:8,9,12
 brief 5:25
 bring 50:21 52:14 53:18,22 54:4
 bringing 21:23 54:2
 broad 31:23
 brought 34:11 50:22,22
 building 32:20
 bullying 29:13,15
 bus 17:5
 business 10:5 50:14
 busy 52:12

C

C 3:2
 call 34:16 35:8
 called 16:18 17:6 24:9,24 30:5
 34:12
 calm 36:16
 candy 54:4
 caption 57:5
 car 15:9
 card 49:16
 Care 46:8,13 47:6,7,18,23,24

48:14 49:5
 careful 53:11
 caretaker 24:7
 cars 51:5
 Case 58:4
 cause 4:16 5:7 27:23 52:23,25
 57:4
 causes 52:24
 Center 27:18 28:15 30:7 31:17
 Central 14:6
 certain 50:8
 certifications 13:21
 certified 4:16
 certify 57:2
 Champlain 17:6
 change 10:25 32:22 35:18 45:22
 46:9 48:12
 changed 48:16 52:11
 changes 58:8
 chaperoning 21:23
 character 32:20
 charged 45:3,4
 check 56:5
 checkups 28:20
 CHEVERIE 2:4
 childhood 24:15
 citalopram 48:2 49:4
 Civil 4:5
 clarifying 25:22
 cleaning 22:19
 clear 6:10 18:4 32:9
 clients 24:7
 Clifton 7:17 47:3,4
 close 21:19 22:4 32:25
 closer 9:23 52:7
 college 9:5,6 10:5 11:15 12:23
 13:4,8,12,14,16 32:8 51:3
 55:7
 come 10:22,23 21:20 28:20 50:20
 51:17
 comfortable 48:25
 coming 10:12
 commenced 5:2
 Commission 56:12
 commit 45:8
 communicate 38:14 41:23
 Community 10:5 11:15 12:23 13:8
 46:8,13 47:5,6,17,22,24 48:14
 49:5

companies 15:10
company 24:4, 10, 14, 24
complaint 17:11, 17, 22, 25 18:2
completed 57:10
completely 19:9
concern 38:22
concerned 35:25 38:10 42:3 43:7
 43:13
concerns 38:15, 20 39:8 40:6
concerts 50:19
concluded 55:19
condition 48:8
conditions 25:10 26:17, 23 27:9
 28:15 29:11 31:18 49:6
Condo 46:7, 14
consecutively 17:3
consequences 44:7
consisting 57:9
Cont'g 11:12, 23 12:20 13:24
 17:16 20:10 21:2, 7 23:6 26:21
 27:3 36:23 37:11, 17, 24 38:13
 39:13 40:25 41:13 42:8 43:12
 51:11
content 55:5
continue 45:18
contractor 15:2, 6
contribute 28:8, 11 33:9, 12
contributed 28:2, 4
contributing 29:8, 10
control 40:12
conversation 25:16 54:16
conversations 26:8 35:9 37:2
 39:21, 23 40:3, 9, 18 41:9 43:23
 50:12 55:3, 5
convey 39:8
convicted 14:7 20:22
conviction 20:12, 15, 18
copy 4:16
correct 14:3, 20 15:11 16:2, 23
 19:20 20:9 21:12, 15 26:15
 27:20 30:14 31:8 45:16 56:5, 7
Corrected 58:16, 18, 19, 20, 21, 22
 58:23
corrections 4:11 20:6 58:8, 11
 58:15
correspondence 38:5
costing 9:25
counsel 57:5
counted 13:13

Country 10:5 11:15 12:23 13:8
County 19:18 56:2
couple 34:13 51:24
courses 13:12, 14
COURT 1:2 5:4, 11, 14, 17 10:8, 13
 10:16, 18, 20 11:2, 7 12:4, 8, 12
 12:14
Cowan 2:10 3:4 5:19, 21, 23 10:8
 10:11, 14, 19 11:2, 4, 9, 12, 23
 12:6, 13, 16, 20 13:24 17:16
 20:10 21:2, 7 23:6 26:21 27:3
 36:23 37:11, 17, 24 38:13 39:13
 40:25 41:13 42:8 43:12 51:7
 51:11 55:14 58:6, 13
crazy 40:17
credits 9:9, 11
crime 14:8 20:22
criminal 20:12, 14
curiosity 26:2
curious 40:19
currently 7:10, 16, 23 14:10

D

D 3:2, 2
dad 21:18 23:14 24:16 33:13
date 1:15 6:18 30:11 42:18 44:8
 46:23 50:8 58:3, 5, 25
day 22:21 31:15 34:14, 16 35:7
 40:2, 4 48:7 54:10 56:10
days 35:7 54:11, 13, 14 58:9, 10
Dear 58:7
death 20:6 30:13 31:7, 12 39:15
 44:5 45:17, 23 46:10 49:23
 50:2 51:13, 21, 22 52:2, 20 54:7
 54:19
December 9:19
decline 44:21
declined 44:23
Defendant 4:6
Defendants 1:12 2:8
definitely 28:3, 24 32:18 44:5
degree 55:9
delivered 15:9 58:10
demeanor 42:20
denied 53:23
Department 20:5
depending 52:11
Deponent 58:5
deposition 1:14 4:5, 11, 14, 15, 17
 5:2 7:5, 8 55:19 58:5

depressed 43:17 44:5
 depression 25:12,14,20 26:8,12
 27:11,19,23 28:5,10,12 29:9
 30:16,17 32:11 43:24 44:9
 45:19,22 47:9 48:10 52:16
 depressive 39:24 43:15
 describe 21:17
 described 23:25
 detailed 32:9
 diagnosed 25:10,14 26:17 27:8
 49:6,9
 diagnoses 27:13 47:19
 diagnosis 26:9 49:12,13,17,22
 49:22
 different 24:22 32:10 35:18
 42:9 47:14 50:21
 digital 14:23
 Direct 3:4 5:20
 direction 48:25
 Directly 15:14
 disabilities 24:12
 disciplined 29:21
 discontinued 54:20,23
 discuss 45:2 54:19,22
 discussed 7:5 49:12
 discussing 11:13
 discussion 49:19
 distracted 52:12
 DISTRICT 1:2,3
 divorce 41:19
 DOCCS 37:20 38:6 39:9 45:4
 doctor 46:13 48:14
 doctors 25:23 26:3 27:22 28:4
 38:18,20 45:25 46:3
 doctors' 49:10
 doing 52:11
 Doordash 15:7,13,24
 dorms 9:24
 dosage 48:3,3
 double 49:3
 dramatic 36:17
 drank 7:2
 dream 32:18 44:2
 drowsy 53:10
 drums 50:25
 duly 4:14 57:7
 duration 34:9

E

E 3:2,2,2

E-L-L-I-S 46:17
 echo 10:23
 echoing 10:15
 education 9:4 55:7
 educational 36:17
 effective 48:19
 effectiveness 48:19,21
 either 19:3 21:13
 elderly 23:19
 eleven 23:12
 Ellis 46:12,13,18,21 47:7,10,15
 47:20
 employed 14:10,12,14,25 15:13
 15:17,24 16:4,15 24:17,20
 employee 18:24
 employees 17:9 18:8,10
 employment 14:24 16:25 24:2
 ended 9:17,19 11:19
 entire 29:3
 environment 43:16
 errata 56:7
 Escape 21:24
 ESQ 2:5,10 58:13
 Essex 19:18
 estate 1:5 55:12
 et 1:1,1,11 2:1,1 3:1,1 4:1,1
 5:1,1 6:1,1 7:1,1 8:1,1 9:1,1
 10:1,1 11:1,1 12:1,1 13:1,1
 14:1,1 15:1,1 16:1,1 17:1,1
 18:1,1 19:1,1 20:1,1 21:1,1
 22:1,1 23:1,1 24:1,1 25:1,1
 26:1,1 27:1,1 28:1,1 29:1,1
 30:1,1 31:1,1 32:1,1 33:1,1
 34:1,1 35:1,1 36:1,1 37:1,1
 38:1,1 39:1,1 40:1,1 41:1,1
 42:1,1 43:1,1 44:1,1 45:1,1
 46:1,1 47:1,1 48:1,1 49:1,1
 50:1,1 51:1,1 52:1,1 53:1,1
 54:1,1 55:1,1 56:1,1 57:1,1
 58:1,1,4
 event 28:6
 events 49:19,24 52:7,16,17
 exact 9:11 26:10 30:11 37:10
 40:18 42:18 46:23
 exactly 24:24 34:16 37:7 48:13
 49:8 54:9
 Examination 3:4 5:20
 Examining 58:6
 exceptions 56:6

experience 13:4 45:24 51:13
experienced 29:14 51:18,21,25
 52:9
Expires 56:12
express 35:10 38:19 40:5
extra 16:9 33:16

F

F 3:2
Facebook 40:14
fact 44:6
factor 28:2
fail 58:10
fall 11:16 53:9
familiar 17:11,20 18:13,23
 20:11 25:9 44:11
family 32:16 33:5,10 35:23
father 10:7 11:19 12:24 19:7,15
 20:4,17 21:8 25:5 26:24 29:3
 29:9,17,21 32:22 33:17 37:18
 38:2 39:9 41:16,20 42:17 45:2
 45:7 49:19 50:6,11 53:14,17
 54:7
father's 28:7,11 30:13 31:6,25
 39:5 45:17,23 46:10 49:23,25
 51:12,21 52:19 55:12
fault 44:7
Federal 4:4
feedback 10:12
feel 34:16 39:24 40:12
feeling 39:25 40:2 44:6
felt 32:17 44:2 48:24
field 21:23
fifteen 8:9
figure 28:21
filed 17:8,12,18
filling 22:17
financial 13:5
find 36:24 51:17
fine 12:5
finish 13:2
finished 9:11
first 19:11 36:4 39:5 43:24
fish 22:9
five 35:6,6
fix 22:16,18
fixing 23:17
focus 40:3
following 46:10 50:13
food 15:9

footballs 50:20
foregoing 56:3 57:3,8
form 4:8
formal 13:15
Forty 48:5
found 50:23
four 42:15
fourteen 21:14
free 55:17
friends 21:24,25
front 42:24 44:12
full 6:15 9:14 25:2,4 34:20
 55:10
further 4:7,10,13 55:7
future 37:13 50:16 55:6

G

G 3:2
game 50:10
gears 27:5
general 2:9 5:24 53:2 58:12
getting 10:14 44:9
girlfriend 7:19 8:16
gist 38:24
give 5:6 18:4 30:11 38:24 43:3
given 49:17
giving 57:6
go 9:15,20 10:6 11:3,8 12:16
 22:17 23:21 28:17 40:13,17
 51:7 55:7,18
going 5:25 10:4,21 11:15 19:6
 22:5 26:2 28:3 30:6 31:23
 38:24 40:6 43:7 51:2 55:9
good 5:22 6:3 10:17
grade 19:25 20:3
graduate 14:4
graduated 9:18 13:25
graduating 51:4
grateful 32:15
great 21:24 40:2
grew 8:25
growing 22:24 24:2
Grubhub 15:3,13,24
guitar 50:24

H

HACH 2:4
Hal 18:24
half 10:2
hand 5:5 23:23

handler 16:6
happen 32:17
happened 11:19 12:18 52:16,18
happening 32:17
harm 18:12 35:11
head 6:9 22:14
heading 56:4
health 25:10 26:12,17,23 27:9
 27:18 28:15 29:11,25 30:7
 31:16,18 49:6
hear 10:9 11:4,24,25 12:2,3,4
 12:10,14 40:11
hearing 4:16
hearings 44:12,20
help 21:22 23:14,17,19,20,21
 30:22 53:9
helped 23:15
helping 23:23
Henry 8:20 16:16 45:13
hereof 56:4 57:6
hereto 57:5
high 13:14 14:2,4 17:2
highest 9:3
histories 13:14
holes 21:25 50:21
holiday 15:19,20 16:10
home 10:2 21:20
homework 21:22
honest 44:25
Honestly 42:12
hotel 16:17
hour 9:25
hours 34:13
house 7:24 8:24 22:15 23:14
household 33:13
housekeeper 16:17
hundred 24:6 29:5 30:5,20 40:24
 54:12
hurt 32:19 43:8
hurting 41:24 42:4 43:4
hydroxyzine 30:19 53:7

I

incarcerated 20:5 24:16 25:7
 26:18
incarceration 20:12 21:16 22:4
 22:6,7 23:13 25:11 27:5 28:8
 28:11 50:24
incident 10:7 11:19 12:24 42:19
inclusive 57:10

independent 15:2,6
Index 1:10 58:4
indicate 27:22,22 36:19 37:4,12
 40:21 41:9
indicated 37:15
indication 43:3
inherit 55:11
initially 36:24
inmates 18:11
Inn 16:18
inside 22:17
Instagram 40:14
Int'l 57:11
interested 49:15
INTERNATIONAL 58:2
issues 25:6
items 53:18,22

J

J 1:11
J-O-S-E-P-H 5:16
jail 19:18,20 25:18 31:25 32:7
 33:8,9 35:15 37:20 39:10
 43:25 53:19
Jamie 18:14
January 8:3,4,12
job 55:10
Joseph 1:1,5,14 2:1 3:1,3 4:1
 5:1,10,13 6:1,17 7:1 8:1 9:1
 10:1 11:1 12:1 13:1 14:1 15:1
 16:1 17:1 18:1 19:1 20:1 21:1
 22:1 23:1 24:1 25:1 26:1 27:1
 28:1 29:1 30:1 31:1 32:1 33:1
 34:1 35:1 36:1 37:1 38:1 39:1
 40:1 41:1 42:1 43:1 44:1 45:1
 46:1 47:1 48:1 49:1 50:1 51:1
 52:1 53:1 54:1 55:1 56:1,3,8
 57:1,3 58:1,5
Jr 6:17
July 36:8
June 1:15 14:18

K

K-I-N-G 5:16
KALKACH 2:5 10:17 11:6,21 12:3
 13:22 17:13 20:8,24 21:5 23:4
 26:19,25 32:3,5 36:21 37:9,14
 37:23 38:11 39:11 40:23 41:11
 42:6 43:9
Kathleen 46:7,14

keep 5:25 10:22
kids 7:14
kind 27:4 32:17 50:9 53:11
King 1:1,1,5,7,7,14 2:1,1 3:1,1
 3:3 4:1,1 5:1,1,4,9,10,13,22
 6:1,1,17 7:1,1 8:1,1 9:1,1
 10:1,1,21 11:1,1,25,25 12:1,1
 13:1,1 14:1,1 15:1,1 16:1,1
 17:1,1 18:1,1 19:1,1 20:1,1
 21:1,1 22:1,1 23:1,1 24:1,1
 25:1,1 26:1,1 27:1,1 28:1,1
 29:1,1 30:1,1 31:1,1 32:1,1
 33:1,1 34:1,1 35:1,1 36:1,1
 37:1,1 38:1,1 39:1,1 40:1,1
 41:1,1 42:1,1 43:1,1 44:1,1
 45:1,1 46:1,1 47:1,1 48:1,1
 49:1,1 50:1,1 51:1,1,12 52:1
 52:1 53:1,1 54:1,1 55:1,1
 56:1,1,3,8 57:1,1,3 58:1,1,4
 58:5,7
knew 36:14 43:20 44:5 55:4
know 12:17 16:16 19:8 20:20
 22:16,24 23:7,10,16,16,25
 26:2,3,4 31:24 32:14,19 33:7
 34:10 36:17 39:3 40:12,15,16
 40:17,18 42:14 43:21,25 44:7
 44:14,15,19,21,23 48:15 49:9
 49:11,21 50:6 52:13
knowledge 25:5 54:23

L

L 46:16,16
L.L.P 2:4
Lake 17:6 24:4,10,11
large 32:7
lasted 44:4
lawsuit 17:8 18:7
leading 39:15 54:18
leads 36:6
learn 22:22
leave 34:11,12 40:6
leaving 41:16
led 20:12 49:20
left 11:14 43:6
letters 34:18,19,21,22,22,24
 38:5
level 9:4
licenses 13:21
life 32:2,7 36:2 38:10
linked 49:22

little 22:19 28:2
live 8:5,7,15,19,21 50:14
lived 8:2 15:15
lives 7:18
living 45:11,14
local 19:18,20
lockbox 34:20
long 8:2,7 9:12 14:14 15:4,16
 16:7,19 23:7 34:6,14 46:24
 52:8
looking 51:4
lot 10:15 21:25 28:3 29:8 32:9
 32:10,14 50:17,18,19 51:6
 52:15

M

Madison 2:6
main 18:2 52:3,22,25
man 40:22 41:10
March 6:19 21:11
marijuana 49:16
married 7:10,12
materials 57:11
math 8:10
matter 39:25
matters 38:23
MCCLAIN 57:2,14
mean 15:8 28:16 52:18
meant 46:11
medical 27:15 38:21 49:15
medication 25:24 30:10,15 31:4
 31:10,14 48:9,12,15,21,25
 53:5
medications 6:23 26:5 29:25
 31:21 35:14,18,19,23 46:9
 47:15 53:15 54:19,22
medicine 46:12,14,16,18,21 47:8
 47:11,20 48:4
meet 41:19
Meghan 7:20 8:17,22 45:15
members 32:16
memories 22:2,2
mental 24:12 25:9 26:12,17,23
 27:9 29:10,24 31:17 49:6
mention 53:14
mentioned 27:19
met 18:20 43:18
Middlebury 16:17,18
milligram 48:5
milligrams 49:2,3

mind 40:17
mom 8:23 13:6 24:17 33:4,22
 37:3 38:16 40:6 45:15
money 9:24 33:5,9,12
month 14:17,25 28:22,25 33:24
 34:5
months 8:9 28:22
Moriah 14:6
morning 5:22,25 53:11
mother 17:8 18:7 35:24 41:10,14
 54:25
Mountain 24:4,9,11
moved 16:21 46:4,6,22 47:3
movie 36:18
moving 51:3,4
multiple 35:7 49:23
mute 12:6,9
Myers 18:24

N

N 3:2,2
name 5:12,15,22 6:15 58:4
named 18:14,24 46:7
names 6:20
necessarily 22:13
need 22:20
needed 23:20 30:24 31:2
negligence 18:10
neighbors 23:18,19
neither 11:6
never 11:19 18:17,20 19:2 22:22
 25:24 27:24 28:5 32:12,16
 35:12,16 37:13,15 38:22 41:21
 43:10,19 53:20,24,25
new 1:3 2:7,7,9,12 7:17 8:6,20
 9:8 16:21 17:6,8 18:23 20:5
 21:9 45:13 47:19 50:22 58:12
 58:14
night 53:8
nineteen 45:10
North 10:4 11:15 12:23 13:7
NORTHERN 1:3
notary 4:12 56:11 58:9
noted 56:4,6
noticed 25:25 53:10
November 39:16 45:8
number 9:11 57:9 58:4

O

O 3:2,2

O.M.H 37:21 38:6 39:9
Objection 11:21 13:22 17:13
 20:8,24 21:5 23:4 26:19,25
 32:3 36:21 37:9,14,23 38:11
 39:11 40:23 41:11 42:6 43:9
objections 4:7
obtain 35:18
obviously 18:20 27:25
occurred 10:7
October 8:12,18
offer 49:17
Office 2:9 5:23 58:12
official 49:12
officially 12:22
Oh 12:6 13:3 16:12 23:15 32:6
 46:18
okay 6:2,3,6,7,10,11 8:10,14,14
 9:12,20 10:11,18,24 11:13,18
 12:10,17,21 13:3,7,15,20
 14:18 15:12,16,23,23 16:14,22
 17:7,20 18:13 19:6,8,12,13,21
 21:3,13 22:5 23:13 24:13 25:2
 25:17 26:4,13 27:7,21 28:7,21
 29:2,7,14 30:12,23 31:3,13
 32:6 36:6,19 37:12 39:3 41:8
 42:15 44:16 45:14 46:2,15,20
 46:24 47:7 49:21 51:7 54:10
old 19:21 21:10,14 23:10 24:13
 45:8
older 26:11
once 28:22,22 31:15 32:17 34:5
 48:7
original 4:13,17
outgoing 23:22
overcome 32:12,13
overnight 22:24 23:5,8
overnights 21:20,21 24:3

P

P 1:1,5 2:1 3:1,2 4:1 5:1 6:1
 7:1 8:1 9:1 10:1 11:1 12:1
 13:1 14:1 15:1 16:1 17:1 18:1
 19:1 20:1 21:1 22:1 23:1 24:1
 25:1 26:1 27:1 28:1 29:1 30:1
 31:1 32:1 33:1 34:1 35:1 36:1
 37:1 38:1 39:1 40:1 41:1 42:1
 43:1 44:1 45:1 46:1 47:1 48:1
 49:1 50:1 51:1 52:1 53:1 54:1
 55:1 56:1 57:1 58:1
P.T.S.D 49:8,13,16,19,22 50:4

package 16:6
Page 57:6
pages 57:9
paid 13:4,8
paint 23:21
painting 23:20
Paledeno 18:14
panic 51:13,15,18,25 52:9,14 53:5,7
Park 7:17 47:3,4
parole 44:11,20,24
part 25:3
partially 37:25
particular 42:21
parties 4:4 58:10
Patrick 1:14 3:3 6:17 56:3,8 57:3 58:5
pending 19:10
people 24:12 40:13
perceived 32:24
percent 24:6 29:5 30:5,21 40:24 54:12
period 27:10 29:25 31:18,21 39:18
perseverance 32:14
person 18:21 19:3
personal 14:23 38:23
personality 32:20
personally 18:18 37:19,21
perspective 32:9
phone 19:3 35:2,10 38:2 39:17 41:23 42:11 54:9
phonetic 18:14,24 46:8
phrase 58:16,17,18,19,21,22,23
physical 33:3
physician 46:7
Physicians 46:8 47:6,7,18 48:14
piano 50:25
picked 37:3
pinpoint 27:25
place 56:4 57:4
places 21:24
PLAINTIFF 2:3
Plaintiffs 1:9
planned 51:2
planning 10:4
plans 41:19 50:13 51:6 55:6
play 50:24
please 5:5,11,14 6:5,16 56:5 58:8,9

point 42:15 52:6 53:13,17,21 54:3,18
pool 22:19
popped 12:18
Port 8:20 16:16 45:13
position 14:21 15:18 23:3,11,24 24:5
positions 24:22
possible 49:12,22
possibly 41:15 55:9
preparation 7:8
prepared 57:10
prescribed 29:24 30:3,10,18,21 31:4,20 35:14 47:14 53:15
prescription 30:22,24
prescriptions 26:23
presence 57:5 58:8
prior 8:4,18 14:24 15:12,23 16:3,14,24 20:22 21:4,16 23:13 25:11 39:16 51:12,21,22 54:7,11
prison 19:18 21:9 22:8 26:14,24 29:3,10,18,21 32:22 33:2,5,10 33:14,17 34:2,19 35:2 36:3 37:19 38:6 42:17 44:13 45:5 50:7,12
probably 42:19 51:16,23 54:14
Procedure 4:5
professionals 38:21
program 17:4
protect 18:11
provided 57:12
providing 23:22
public 4:12 56:11 58:9
pursuant 4:6
put 32:10 42:24

Q

Queensbury 9:8,24
question 6:4 10:9 12:19,21 19:10,11 31:24 36:7
questions 4:8 5:24 17:10 19:7 22:6 26:12 55:14,17
quickly 51:8

R

R 3:2
radius 28:25
raise 5:5
rarely 51:23

read 4:10 56:3 58:8
reality 44:4
really 22:4 25:25 31:23 50:25
 51:15 55:15
reason 29:18 43:14
recall 24:13,19 26:10 27:12
 28:19 31:3,9,14 37:7,10 39:17
 39:22 40:18 41:2,3 42:13,20
 44:16 48:11,13 54:6,9,15
receive 26:22 27:15 53:4
receiving 50:3
recollection 44:8
record 5:12,15 6:10,16 11:3,8
 11:10,11 51:8,9,10 56:4 57:10
records 27:16
regarding 38:23
regretted 37:5
regular 28:20
regulations 45:5
rejoicing 50:18
relationship 21:17 25:21 32:21
 32:25
release 50:13
released 50:7,11
remained 22:4
remember 22:20 24:23 30:9 34:15
 42:16,18 46:23
rent 7:21,23
repeat 10:9
rephrase 6:5 18:3
Reporter 5:4,11,14,17 10:8,13
 10:16,18,20 11:2,7 12:4,8,12
 12:14 57:14
Reporters 57:11 58:2
represent 17:9
reserved 4:9
reside 7:16
residence 7:22
respective 4:4
response 41:3
responsibility 18:10
responsiveness 4:8
restaurant 17:5
restaurants 50:23
result 44:19
Return 58:11
returned 4:15
review 7:7
ride 22:9,11

right 1:8 5:5 6:13 9:3 10:19
 13:16,19 16:3,24 17:7 19:19
 20:7,20 26:16 32:4 39:5,7
 42:14
room 6:12 40:16
ROSE 2:4
Rules 4:5
rush 16:10,10

S

S 3:2 46:16
Saratoga 8:6,7,15 15:15 16:21
 46:4,6,23
sat 34:11
satisfied 48:20,23
saying 6:9 41:4
scene 36:18
SCHIRIPA 2:4
school 9:13,21,23 13:14 14:2,4
 14:6 17:2 29:12,15,20,22 32:8
 53:3
school's 17:3
schooling 13:16
screen 10:23
season 15:19,20
seasonal 15:18 16:8
seasonally 16:5
see 10:24 13:3 23:18 34:2 44:9
 46:5 50:19
seeing 10:22 38:19 40:22 41:10
seek 46:20
seen 17:17 32:16
seldom 33:15 40:10
seldomly 20:19 51:19
self- 18:11
self-endangerment 18:11
self-strength 32:14
semester 9:14,17,19,21 10:6
 11:16 13:2
send 33:4 38:4
sent 27:17
sentence 21:9 32:2,7
separation 41:20
sertraline 30:5,8 31:13 49:3
service 24:4,8,10,12
Services 24:11
set 44:8,10
setting 22:18
seventeen 39:4
Seventh 20:3

shaking 6:9	stalk 40:14
sheet 56:7	start 50:14
shifts 16:9	started 47:25
shopper 14:23	state 2:9,11 5:12 6:15 17:9
shovel 23:18,20	18:7,24 20:5 21:9 43:15 56:2
show 22:15 39:24 50:23,25	58:12,13
showing 12:8	stated 57:5
sic 20:19 51:19	STATES 1:2
side 39:25	stay 34:8
sign 4:11 58:8,10	staying 9:23
signature 58:11	steered 48:24
signed 4:14 10:6 58:25	stick 22:7
significant 40:15	STIPULATED 4:3,7,10,13
similar 24:23 34:5 39:23 42:23	STIPULATIONS 4:2
simple 22:14,18 23:16 25:15	stocker 23:5,8
43:22	Street 2:11 58:13
single 33:23 40:15	strike 45:4
sister 7:19 8:16,22 37:3 38:17	stuff 16:9
45:15	subpoena 4:6
sit 40:13	substance 25:6 39:20 54:16
sitting 40:16 55:16	suicide 36:8,20 37:5 38:9 45:8
six 28:22	Suite 2:11 58:13
skepticism 40:13	sulk 42:24
sleeping 21:21	sum 39:20 54:15
Slightly 40:7	summer 16:20,22,25 17:3 22:2
social 18:14	SUNY 9:7,15 11:14 13:3
something's 10:21	supposed 50:7
somewhat 26:3 32:19	sure 6:8 9:10 18:5 24:7 29:5
soon 34:9	30:5,21 40:24 41:4,7 44:25
sorry 12:19	49:7,8 54:13
sort 24:7	swear 5:5
Sounds 6:3	swim 50:21
South 2:11 58:13	swimming 21:25
speak 20:17 34:25 35:13,17,22	switch 27:4 46:2 48:18
37:19,21,25 41:14,15,18	switched 45:25 47:2,17,23
speaking 35:20 39:17 42:11	sworn 3:3 5:10,18 56:10 57:7
specialized 50:3	Syracuse 2:12 58:14
specific 27:24 38:22	
specifically 28:5 37:15 42:7	T
43:20 49:23,25 53:5	tag 33:23
specifics 39:2 44:15	take 19:8,9,11 31:11 36:2 38:10
spell 5:15	39:14 48:6
spelling 18:15,24 46:8	taken 4:6 13:12 30:24 56:4 57:3
spent 19:18 22:3	talk 36:17 38:25 40:4 49:9
spoke 18:17 35:4 41:23 53:13	talked 13:11 51:4
54:7	tank 22:17
spoken 19:3	tasks 22:13 23:17
Springs 8:6,8,15 16:21	taught 22:9,11,12,21 32:13
staff 37:20,21 38:2,6 39:10	50:24
	teach 22:20

teacher's 24:25
teaching 24:22 51:5
tell 6:5 40:8
testify 6:24 57:7
testimony 5:6 56:4 57:3,6 58:8
Thank 5:17,19 55:15
therapists 38:20
thing 28:10 37:10
things 21:21 22:10,14,18,19
 27:25 29:8 32:10 50:17,18
think 10:17 12:6 13:25 22:13
 24:21 38:8 47:4,23 51:20
thinking 9:22 41:24 42:4 43:3
 55:8,10
thirteen 21:10,14
thirty 58:9,10
thought 41:9 53:22,25
three 28:25 54:14
throw 50:20
Ti 30:7
Ticonderoga 27:18 28:15 31:16
 47:13
time 1:16 4:6,15 9:10,22 15:25
 19:18,23 20:2,21,22 22:2,25
 25:2,3,4 27:9 28:4 29:3,15,25
 30:4,7 31:18,21 32:19 34:5,9
 34:15,17 37:5,18 38:19 39:18
 40:22 41:6,7,8 42:16 43:18
 44:8,13 45:3,9,12,15 46:15
 51:18 52:12 54:6,11 55:10
 56:4 57:4
times 22:3 28:16 35:6,7 51:24
today 5:6 6:23 7:2 17:10
toilet 22:16
told 40:2 49:18
top 22:14
town 17:4
trade 53:18,22,23,25
transcript 56:5,7 58:8,10,11
transcription 57:9
transfer 11:15 12:22,25
transferring 9:23 11:20 51:3
treat 28:14 30:16 31:17 45:18
 46:24 47:8,10 48:9
treated 27:18
treatment 45:21 46:21 50:4
trial 4:9,16 41:20
trips 21:23
true 36:15,16 56:5,7 57:10

truth 5:7,7,8 57:7,7,8
truthfully 6:24
try 5:25 36:2 37:13 38:10 39:24
 40:3 42:24 48:18
tuned 51:6
twelve 19:24 20:21
twice 52:7,9
Twitter 40:14
two 13:13 15:14 17:2 54:10,14
two-year 55:9
typewritten 57:8
typically 34:7,14

U

U.P.S 16:6,7
uh-huh 6:10
understand 6:5 19:9 51:14
understanding 10:12 17:24 18:6
 19:14
uneasy 50:10
UNITED 1:2
use 22:21
usual 39:23
usually 53:8

V

v 1:1,10 2:1 3:1 4:1 5:1 6:1
 7:1 8:1 9:1 10:1 11:1 12:1
 13:1 14:1 15:1 16:1 17:1 18:1
 19:1 20:1 21:1 22:1 23:1 24:1
 25:1 26:1 27:1 28:1 29:1 30:1
 31:1 32:1 33:1 34:1 35:1 36:1
 37:1 38:1 39:1 40:1 41:1 42:1
 43:1 44:1 45:1 46:1 47:1 48:1
 49:1 50:1 51:1 52:1 53:1 54:1
 55:1 56:1 57:1 58:1,4
various 22:13
VENUE 1:17
Vermont 16:17
violating 45:4
visit 33:18 42:21 43:2,6
visited 33:21 42:17
visits 34:6 49:10
visually 17:19
vivid 22:2

W

waiting 50:10
waking 43:24 44:2
Walgreens 15:15,17,24 16:3

Walmart 14:13,22,25 23:2,3,8,25
want 19:7,8,9 27:4 53:22
wanted 35:11 40:4 48:18,18
 49:14 50:18,19,19,20,23,25
wanting 35:18 53:23
wasn't 32:11 48:23
water 22:17
way 19:4 28:2 32:7,8 35:11
 40:15 41:25 42:4,10 43:4 44:4
we'll 22:7
WebEx 1:17
week 35:6,7 39:15,16 41:22 42:5
 42:10 52:7,9
weekend 33:23,24
weekends 42:19
went 22:8,15 25:18 26:14 33:8
 33:22 44:14,16 47:17,24
Westport 17:6
witness 4:10,14 5:13,16,18
 10:24 12:10,17 57:6
wonder 26:2
wondering 17:10 18:5
Word 58:16,17,18,19,21,22,23
work 5:23 16:7,15,19 17:2 23:16
 25:3 29:12 32:8 53:3
worked 16:5,16 17:5 21:20 23:8
 24:3,21
worker 18:14
working 15:12 22:24,25 23:2,11
 24:14
worried 40:22
write 34:19
wrong 25:25
wrote 34:22,23,24

X

X 1:13 3:2 56:8,11

Y

YAMILE 2:5
yard 23:16
yeah 10:10,13 11:9 21:11 23:21
 24:23 28:18 32:18 41:6
year 15:5 16:11 17:4 34:2
years 17:3 21:10,14 42:15
York 1:3 2:7,7,9,12 7:17 8:6,20
 9:8 16:21 17:6,8 18:23 20:5
 21:9 45:13 58:12,14
young 33:8 39:3
youth 17:3

Z**0****1**

1 57:6,9
10:12 1:16 5:2
10:17 11:10
10:20 11:11
10016 2:7
11:10 51:9
11:18 51:10
11:20 1:16 55:19
112 2:6
13205 2:12 58:14
16th 6:19 21:12 39:16 45:8
1999 6:19

2

2012 19:15,22 20:23 21:4
2012-ish 27:6
2013 20:6,23 21:10,17 25:18
 26:14 29:3
2016 36:8,25 38:9 39:5
2017 9:19,19 14:2 17:5
2018 11:16 20:6 27:6 29:4 30:13
 31:7 39:16 45:8 51:13
2019 8:11,12,18 15:21 16:22,25
2021 8:3,4,11,13 15:22 16:12
2022 1:15 14:19 56:10
24 1:15

3

30 58:9,10
300 2:11,11 58:13,13

4**5**

5 3:4
523-7887 58:2
55 57:9

6

6/24/2022 1:1 2:1 3:1 4:1 5:1
 6:1 7:1 8:1 9:1 10:1 11:1
 12:1 13:1 14:1 15:1 16:1 17:1
 18:1 19:1 20:1 21:1 22:1 23:1
 24:1 25:1 26:1 27:1 28:1 29:1
 30:1 31:1 32:1 33:1 34:1 35:1

36:1 37:1 38:1 39:1 40:1 41:1
42:1 43:1 44:1 45:1 46:1 47:1
48:1 49:1 50:1 51:1 52:1 53:1
54:1 55:1 56:1 57:1 58:1,5

7

8

800 58:2

9

9:20-CV-1413 1:10 58:4